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December 28, 2020

BY ECF

Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The request to extend
Defendant's time to file an
amended CJA financial affidavit
to January 13, 2021 is GRANTED.
SO ORDERED.

Loretta A. Preska 12/29/2020

Re: *United States v. Brandon Becker*, 19 Cr. 704 (LAP)

Dear Judge Preska:

On December 2, 2020, this Court appointed me to represent Brandon Becker following his retained counsel's request to be relieved from the case for personal reasons. Subsequently, on December 15, 2020, this Court so-ordered the government's request for Mr. Becker to file an amended Criminal Justice Act (CJA) financial affidavit to determine whether he qualifies for appointment of counsel under the CJA by December 30, 2020. The government specifically requested disclosures of, among other things, spousal assets, family assets and potential oversea holdings. *See* ECF No. 50 at 1 -2. The Court ordered that Mr. Becker disclose: "(1) all of the assets held or controlled by him directly or beneficially, in whatever name they are held; (2) all of his spouse's assets in which he has a marital interest, including any assets that Becker holds or controls in his wife's name; and (3) the assets in the name or controlled by his mother, including those in the name of CGI or other companies." *Id.* at 2 – 3.

Mr. Becker has been endeavoring to gather comprehensive responsive information, some of which requires coordination with others as well as accounting professionals. Given holiday schedules of those other parties, Mr. Becker does not yet have the relevant data to include with an amended CJA financial affidavit. Further, given my travel and other work commitments, I will not be able to adequately review the amended affidavit prior to the current December 30, 2020 deadline.

In order to ensure the accuracy of the amended CJA financial affidavit and to include all of those categories of information that the Court ordered be disclosed, the defense respectfully requests a two-week extension of time by which Mr. Becker has to file an amended CJA financial affidavit from December 30, 2020 to January 13, 2021. This is the first request for an extension of time. Earlier this afternoon I asked the government for its position on this request but I have not yet received a response.

Respectfully,

/s/ Megan W. Bennett
Megan W. Bennett

cc: All Counsel of Record by ECF